

AO 91 (Rev. 08/09) Criminal Complaint

United States District Court
Southern District of Texas
FILED

UNITED STATES DISTRICT COURT

MAY - 6 2016

for the

Southern District of Texas
5/9/16 /lc

David J. Bradley, Clerk

United States of America

v.

Antonio Arredondo Jr.

YOB: 1975; Citizenship: United States

UNSEALED

Case No.

11-16-0872-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 04, 2014 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

8 U.S.C. § 1324(a)(1)(A)(v)(I); and
8 U.S.C. § 1324(a)(1)(A)(ii)

Offense Description

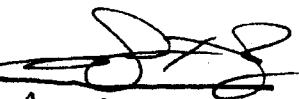
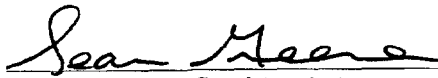
Knowing and in reckless disregard of the fact that individuals, who were
aliens, had come to entered and remained in the United States in violation of
law, did knowingly and intentionally conspire and agree with others to
transport, attempt to transport, move, and attempt to move said aliens, within
the United States by means of transportation or otherwise, in furtherance of
such violation of law;

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.

Approved to file:


ANSA

Complainant's signature

Sean Greene, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

May 6, 2016 3:45pm

Judge's signature

City and state:

McAllen, Texas

U.S. Magistrate Judge

Printed name and title

ATTACHMENT "A"

On August 04, 2014, Border Patrol Agents (BPAs) conducting line watch duties along the Rio Grande River encountered a group of three undocumented aliens (UDAs) near the Pharr, Texas Port of Entry (POE). The UDAs were identified as Victor Manuel MORENO-Ruiz (hereinafter V. MORENO), Bibi SOLIS-Cruz (hereinafter B. SOLIS), and Luis Manuel CASTRO-Esquivel (hereinafter L. CASTRO).

On August 05, 2014, Pharr Police Department (PPD) officers discovered a deceased female on the levee near the POE in Pharr, Texas, who was later identified as Maria De Lourdes SANTOS-Becerra (hereinafter SANTOS). PPD investigators contacted SANTOS' husband Pablo CASTILLO-Perez (hereinafter CASTILLO), who stated that the human smuggler responsible for SANTOS' passage was known to him as Tony, last name unknown (hereinafter Tony LNU). CASTILLO further advised that he had contacted Tony LNU at [REDACTED]. Subsequent investigative findings indicated SANTOS fell from the Pharr International Bridge (hereinafter the bridge) while attempting to illegally enter the United States as a member of a group of UDAs guided by V. MORENO.

SAs issued an administrative subpoena to T-Mobile USA for subscriber information associated to the phone number [REDACTED]. The service provider responded with account information, which revealed that number was on an account in the name of Antonio ARREDONDO Jr. (hereinafter A. ARREDONDO), a previously identified human smuggler that resided in Alamo, Texas.

On October 16, 2014, Special Agents (SAs) with Homeland Security Investigations interviewed B. SOLIS regarding the facts surrounding her illegal entry to the United States and the aforementioned apprehension by BPAs. B. SOLIS identified V. MORENO from a photo lineup as the individual that served as the alien brush guide when she was apprehended on August 04, 2014. B. SOLIS identified a photograph of L. CASTRO as a UDA that entered the United States illegally with her and was subsequently apprehended along with her by BPAs. B. SOLIS identified a photograph of SANTOS as a UDA that entered the United States illegally with her and subsequently fell from the Bridge on or about August 04, 2014.

B. SOLIS further stated that on August 03, 2014, V. MORENO, along with two unidentified individuals transported her, L. CASTRO, and another two (2) UDAs in a van from an alien stash house in Reynosa, Tamaulipas, Mexico to the international bridge near Pharr, Texas. B. SOLIS stated that after they had traveled a long distance on the bridge, V. MORENO instructed the driver to stop the van at a designated point on the bridge that was in close proximity to the inspection area at the Pharr, Texas POE. B. SOLIS stated that the unidentified transporters dropped off V. MORENO and the group of four UDAs. B. SOLIS stated that V. MORENO then guided her and the other UDAs to climb over the high fencing along the top of the bridge and scale down to the ground below as they entered the United States illegally. B. SOLIS stated that in the process of scaling down from the bridge an unidentified female UDA fell onto the roadway beneath the bridge and was injured. B. SOLIS stated that V. MORENO abandoned the

ATTACHMENT "A"

injured woman and continued to guide the remaining UDAs via a clandestine route away from the bridge. The group of UDAs continued along this route until BPAs apprehended three of them. The fifth member of the group, an unidentified male, fled on foot and evaded arrest. B. SOLIS stated when they were taken into custody; V. MORENO instructed her and the other UDAs not to inform the BPAs about the injured, fallen female UDA and to not tell the agents that he was the group's guide.

On February 25, 2015, SAs met with material witness Sabas SOLIS-Sanchez (hereinafter S. SOLIS). S. SOLIS subsequently provided SAs with the following non verbatim information regarding the smuggling event that he was involved in on August 04, 2014.

In July 2014, S. SOLIS contacted an alien smuggler that he knew as Tony LNU by calling cell phone number [REDACTED]. S. SOLIS contacted Tony LNU to inquire about smuggling his daughter B. SOLIS into the United States from Mexico. Tony LNU affirmed that he would be able to bring B. SOLIS into the country and quoted S. SOLIS a price of \$1,200 (USD) for the smuggling fees.

When S. SOLIS agreed to the terms, Tony LNU told him to have his daughter go to the bus station in Reynosa, Tamaulipas, Mexico at a designated hour, where she would be picked up by an unidentified individual and taken to an alien stash house in Reynosa, Tamaulipas, Mexico. S. SOLIS then met Tony LNU at a predetermined location in San Juan, Texas, where S. SOLIS paid Tony LNU \$600 in cash for half the smuggling fees.

SAs showed S. SOLIS a photographic lineup display consisting of six persons with similar appearances. SAs asked S. SOLIS if he recognized any of the individuals depicted in the photographs as being involved in the smuggling event that occurred on August 04, 2014. S. SOLIS identified the individual shown in Photograph Number Three, who was A.

ARREDONDO, as the person he knew as Tony LNU that he contracted and paid to smuggle his daughter B. SOLIS into the United States from Mexico during the failed smuggling incident that occurred on August 04, 2014.